

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

CASE NO. 2:23-cv-11718-RJW-APP

YAACOV APELBAUM,
and XRVISION, LTD.,

Plaintiffs,

v.

STEFANIE LAMBERT, THE
LAW OFFICE OF STEFANIE
L. LAMBERT, PLLC, and
BILL BACHENBERG,

Defendants.

_____ /

DECLARATION OF STEFANIE LAMBERT

Pursuant to 28 U.S. Code § 1746 STEFANIE LAMBERT (hereinafter referred to as the “DECLARANT”), states as follows:

1. The DECLARANT is a named Defendant in this Action. The following facts are within the DECLARANT’s personal knowledge and if called upon to testify, I would and could competently testify to these facts.

2. In the DECLARANT’s capacity of holding the office of managing member of The Law Firm of Stefanie L. Lambert, PLLC a Michigan professional limited liability company, In the DECLARANT is readily familiar with the records

of the company.

3. The Plaintiffs, YAACOV APELBAUM, and XRVISION, LTD., filed this action on July 18, 2023. The Plaintiffs in this matter did not serve the DECLARANT or The Law Firm of Stefanie L. Lambert, PLLC with the complaint in the above-captioned case.

4. Neither the DECLARANT, nor anyone authorized to accept service on behalf my behalf was served with a summons and complaint as to this legal action.

5. The Law Firm of Stefanie L. Lambert, PLLC was not served, nor anyone authorized to accept service on behalf of The Law Firm of Stefanie L. Lambert, PLLC was served with a summons and complaint to this legal action.

6. The DECLARANT has received multiple death threats related to the DECLARANT's representation of clients with their underlying litigation regarding the 2020 Presidential Election, rather than attempting to evade service. A true and correct composite copy of a few of these death threats is attached hereto and marked as Exhibit "A."

7. The Plaintiffs allege that the DECLARANT was served via Alternative Service on or around January 4, 2024.

8. The DECLARANT has been informed that an individual named Mario was served with a copy of the Complaint and Summons at 19245 23 Mile Rd., Macomb, MI 48042. The DECLARANT has neither resided 19245 23 Mile Rd.,

Macomb, MI 48042 nor does the DECLARANT know anyone named “Mario.”

9. At the time of the alleged service on or around January 4, 2024, the DECLARANT served as the agent for service of process for The Law Firm of Stefanie L. Lambert, PLLC. To the DECLARANT’s present knowledge and to this date, The Law Firm of Stefanie L. Lambert, PLLC nor the DECLARANT have been served with a copy of the summons and complaint relevant to this action.

10. Attorney Michael J. Smith was retained to represent the DECLARANT in other cases and agreed to file a Motion to Dismiss in the above styled case. The DECLARANT has since learned that no such Motion to Dismiss had been filed.

11. Moreover, attorney Michael J. Smith did not file an appearance on my behalf in the above styled case.

12. Per this Court’s public docket, a Clerks Default for this action was entered against the DECLARANT and The Law Firm of Stefanie L. Lambert, PLLC on or around February 27, 2024. At no point prior to this aforementioned date was the DECLARANT or any authorized agent of The Law Firm of Stefanie L. Lambert, PLLC made aware of service of the Complaint.

13. Due to the foregoing, at no point prior to the Clerks Default being entered into this action was the DECLARANT served or made aware of the specific and actual allegations in the Plaintiffs’ Complaint filed action nor of alleged service of the corresponding summons or complaint. Due to the Plaintiffs’ failure to timely

and actually serve the DECLARANT or The Law Firm of Stefanie L. Lambert, PLLC with this action's complaint and summons, neither the DECLARANT nor The Law Firm of Stefanie L. Lambert, PLLC have been granted the opportunity to respond to the Plaintiffs' complaint and corresponding allegations.

14. As the DECLARANT was not properly served with the complaint and summons to this action, the DECLARANT was unaware specific allegations in this action and have been deprived of the ability to respond to the Plaintiffs' Complaint.

15. Based on the foregoing, the Clerks Default entered in this action was not caused by inexcusable neglect or avoidance of service as the DECLARANT was unaware of the specific allegations of this action at any time prior to recently.

16. The DECLARANT has been the subject of a substantial volume legal actions in the past four years, ascertaining the progress or status of each case is overwhelmingly difficult and time consuming.

17. The DECLARANT has mistakenly believed that this case had been dismissed, and no further action would be necessary.

18. Upon learning of the Clerks Default, the DECLARANT immediately sought legal counsel and diligently pursued this relief. By and through my counsel, the Plaintiffs have not agreed to a joint stipulation to set aside the Clerks Default against the DECLARANT and The Law Firm of Stefanie L. Lambert, PLLC thus, the DECLARANT has no choice but to respectively seek court intervention.

19. The DECLARANT has reviewed the Plaintiffs' Complaint and wholly disputes the Plaintiffs' claims as stated in their Complaint. In fact, upon investigating Plaintiffs' allegations, the DECLARANT has not made the allegedly slanderous statements, libel, nor did the DECLARANT request the Plaintiffs to perform the work as alleged in their Complaint.

20. The statements that the Plaintiffs' allege to be libel and or slanderous were either not made at all or entirely true.

21. The circumstances of which the Plaintiffs allege that any statements were made, relate entirely to discussions made with state legislatures and/or state senators, and are privileged communications. To the extent any inaccurate statements were made, those statements were made in good faith and belief in truth.

22. Accordingly, the DECLARANT respectfully requests this Court to set aside the Clerks Default, so that the DECLARANT and The Law Firm of Stefanie L. Lambert, PLLC may move forward in protecting our rights and have this action heard on its actual merits.

I declare under penalty of perjury that the foregoing is true and correct. Executed
on 7/1/2025.

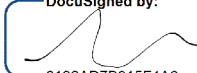
DocuSigned by:

6132AD7B915F4A6...
Stefanie Lambert

EXHIBIT A



Form From Your Website



Contact Form

Site

Attorney Stefanie Lambert

Submitted content

Name: Maga Hunter

Email: hang'em@high.com

Phone: [15414144144](tel:15414144144)

Subject: Lube

Message: I love MAGA, don't you? Make Attorneys Get Attorneys, right your worthless shitbag? How was getting arrested? Did you enjoy that? Once you have had your bar license pulled here shortly, you'll be more vulnerable and open to those who want to 'speak' to you. Remember- You can run, but you can't hide. You did the "Fuck around" part, and now you get the "Find Out" part.

Number of submissions received

17/1000 this month

March 21st – April 20th

Need more submissions?

Please contact your website administrator.

If you believe this is a spam submission, please forward to [form-spam-](#)

You just got a form submission!

Form

Contact Form

Site

Attorney Stefanie Lambert

Submitted content

Name: Mok boge

Email: mokboge@gmail.com

Phone: [212-595-0215](tel:212-595-0215)

Subject: Justice

Message: I want to beat you to death with your shoe. Kick your door in and execute your family.

Number of submissions received

7/1000 this month

October 21st – November 20th

Need more submissions?

Please contact your website administrator.

If you believe this is a spam submission, please
click the form spam-

Form From Your Website

Form

Contact Form

Site

Attorney Stefanie Lambert

Submitted content

Name: Every Rear Patriot

Email: myopinion@1stamendment.org

Phone: [+1 232-5563](tel:+1232-5563)

Subject: uHHHH....PLEASE DIE?

Message: TREASONIST

Number of submissions received

4/1000 this month

March 21st – April 20th

Need more submissions?

Please contact your website administrator.

If you believe this is a spam submission, please forward to form-spam-reports@support.webflow.com